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5 *Attorneys for Plaintiffs*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 COLLECTION GUARANTEE COMPANY, ) Case No.: 2:16-CV-00144-GMN-PAL  
9 LLC, )  
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PLAINTIFF,  
V.  
SENTINEL ENERGY SOLUTIONS  
CORPORATIONS, ET AL.,  
DEFENDANT.

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE**  
**PLEADING**  
**(FIRST REQUEST)**

17 Defendants, by and through their counsel of record, John P. Aldrich, Esq., of the Aldrich  
18 Law Firm, Ltd., hereby move this Honorable Court for an extension of time to file their response  
19 to the Complaint. This is the first request.

20 DATED this 2<sup>nd</sup> day of February, 2016.

21 **ALDRICH LAW FIRM, LTD.**

22  
23 /s/ John P. Aldrich  
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26 1601 S. Rainbow Blvd., Suite 160  
27 Las Vegas, Nevada 89146  
28 Tel: (702) 853-5490  
*Attorneys for Defendants*

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I.**

**STATEMENT OF FACTS**

Pending before this Honorable Court in is the above-captioned removed matter arising out of a claim in commercial breach of contract, *inter alia*.

On December 9, 2015, Plaintiff filed a Complaint in the Eighth Judicial District Court, State of Nevada. On January 26, 2016, Defendants filed Notice of Removal [Dkt. #1]. Defendants' response is due February 2, 2016.

This Motion for Enlargement is timely. Defendants' lead counsel, Matthew Weisberg, Esq., has reached out to Plaintiff's counsel seeking an agreement regarding the requested extension, but as of the filing of this Motion, neither Mr. Weisberg nor the undersigned had received a response.

The undersigned was recently retained and will be working with Mr. Weisberg, who will shortly move for admission *pro hac vice*.

Defendants are requesting an additional 14 days to respond to the Complaint, making Defendant's responsive pleading due February 16, 2016.

**II.**

**LEGAL ARGUMENT**

The Court may extend the time for a party to do any act upon a showing of good cause. FRCP 6. Defendants are located out of state and have not delayed in retaining counsel. Defendants have retained lead counsel and local counsel, and are now ready to proceed, but need additional time to prepare a responsive pleading. The foregoing constitutes good cause for this first request for extension of time.

**III.**

**CONCLUSION**

Defendants respectfully request this Honorable Court grant Defendants' Motion for Enlargement of Time to File Responsive Pleading (First Request), and give Defendants an additional 14 days to respond to the Complaint, making Defendant's responsive pleading due February 16, 2016.

DATED this 2<sup>nd</sup> day of February, 2016.

**ALDRICH LAW FIRM, LTD.**

/s/ John P. Aldrich

John P. Aldrich, Esq.

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PLAINTIFF,  
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SENTINEL ENERGY SOLUTIONS  
CORPORATIONS, ET AL.,  
DEFENDANT.

15 **ORDER GRANTING DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO**  
16 **FILE RESPONSIVE PLEADING**  
17 **(FIRST REQUEST)**

17 IT IS HEREBY ORDERED that Defendants' Motion for Enlargement of Time to File  
18 Responsive Pleading (First Request) is GRANTED.

19 IT IS FURTHER ORDERED that Defendants shall respond to the Complaint on or before  
20 February 16, 2016.

21 DATED this 26th day of February, 2016.

23   
24 UNITED STATES MAGISTRATE JUDGE

25 Dated: February 26, 2016